

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE DIVISION**

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<b>CABINETS TO GO, LLC,</b>	)
<b>Plaintiff,</b>	)
<b>vs.</b>	) <b>CASE NO.: 3:21-cv-00711</b>
<b>QINGDAO HAIYAN REAL ESTATE</b>	) <b>Chief Judge Waverly D. Crenshaw, Jr.</b>
<b>GROUP CO., LTD;</b>	)
<b>QINGDAO DROUOT WOOD</b>	) <b>Magistrate Judge Jeffrey S. Frensley</b>
<b>INDUSTRY CO. LTD.,</b>	)
<b>ALNO INDUSTRY SDN BHD, and</b>	)
<b>SCIOTO VALLEY WOODWORKING,</b>	)
<b>INC. d/b/a VALLEYWOOD</b>	)
<b>CABINETRY,</b>	)
<b>Defendants.</b>	)

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**SECOND DECLARATION OF LEI LI**

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Lei “Sabrina” Li, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over eighteen (18) years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.
2. I am the Senior International Business Manager of Qingdao Haiyan Real Estate Group Co., Ltd. (“Haiyan”). I am the Account Executive responsible for managing purchase orders sent from Cabinets To Go, LLC (“CTG”) to Haiyan. I submit this Declaration in support of Defendants’ Reply in Support of Motion to Dismiss.

3. Haiyan has its own Board of Directors, maintains separate books, separately files taxes in its home country, owns property on its own respective name, has separate offices, hires and maintains its own workforce, and enters into binding contracts independently.

4. In July 2019, I went on a business trip to the United States with my colleague, Wei Zheng, the former International Business Director of Haiyan. The main purpose of the business trip was to visit Valleywood Cabinetry in Waverly, Ohio.

5. During our stay in the US, Mr. Jason Delves, Cabinets To Go's CEO, invited Ms. Zheng and I to meet with him in Boston, Massachusetts on August 2, 2019. Mr. Tom Sullivan, the owner of CTG, also invited us to lunch at his home in Boston for the same day.

6. I asked Jian "Philip" Jiao to assist Ms. Zheng and I with transportation and travel in Boston.

7. The August 2, 2019 meeting in Boston, Massachusetts was the only in-person meeting between Haiyan and CTG in "late" 2019.

8. On November 8, 2019, Ms. Zheng and I received an email invitation from Mr. Delves regarding the CTG Leadership Summit taking place from January 12 to 14, 2020 in Franklin, Tennessee (the "Summit"). A true and accurate copy of the invitation Haiyan received is attached here as **Exhibit A**. The Summit was presented to Haiyan as a \$15,000 "sponsorship" opportunity, in other words, an opportunity for Haiyan to financially support CTG.

9. Prior to receiving CTG's invitation for the Summit, Mr. Liyan Jiao, President of Haiyan, had already booked travel to tour the 2020 Kitchen and Bath Industry Show in Las Vegas, Nevada and to visit his son in Columbus, Ohio in late January 2020. Haiyan attended and sponsored the Summit because the dates coincided with these trips to the United States.

10. To date, no employee of Haiyan has traveled to Tennessee after January 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 16/2, 2022.

Lei Li  
Lei Li

**From:** Jason Delves <jdelves@cabinetstogo.com>  
**Sent:** Tuesday, November 12, 2019 7:25 AM  
**To:** 郑伟  
**Cc:** 李蕾; Nathan Poe  
**Subject:** Re: CTG Leadership Summit

That is great news Vivian. Thank you for the support.

Jason Delves  
President  
Cabinets To Go  
478-731-6036

On Nov 12, 2019, at 5:02 AM, 郑伟 <vivian@haiyanwoodworking.com> wrote:

Dear Jason,

We are pleased to hear the information of Cabinets to Go's first Leadership Summit and than you for the invitation to attend the Summit. It is a great idea for sales managers exchange their experiences and sales skills, and the communicate with suppliers is important for both Cabinets to Go and suppliers to develop the popular products with good quality to satisfy customers' demand, gain more market shares. We believe it will be very helpful to grow sales and bring more successful business for Cabinets to Go. We wish you a successful summit, and we are happy to attend the meeting.

As a long term partner who experienced Cabinets to Go's business growth since the very beginning, and will be important strategic partners in future, we are happy to be honored as Platinum sponsor to the Summit. We will be well prepared for the Summit, attend the Vendor Appreciation Day event, and be there from January 12-14th.

We will communicate with Nathan for the following work.

Thank you and best regards.

Vivian Zheng  
Qingdao Haiyan Group

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发件人： Jason Delves <jdelves@cabinetstogo.com>  
发送时间： 2019年11月8日(星期五) 00:44  
收件人： 郑伟 <vivian@haiyanwoodworking.com>; 李蕾  
<sabrina@haiyanwoodworking.com>  
抄 送： Nathan Poe <npoe@cabinetstogo.com>  
主 题： CTG Leadership Summit

Sabrina and Vivian,

I am pleased to provide information regarding Cabinets to Go's first Leadership Summit. From January 12-14<sup>th</sup>, we are bringing all store managers to Nashville, TN, for a series of training workshops, group meetings and a vendor exhibition hall. In the past, I have found similar events to be a very useful avenue for sharing best practices and learning about sales opportunities within the company.

For vendors in particular, we will host an exhibition hall that will feel similar to a trade show. Key suppliers will be provided a booth where you can display current and potential future items. We will be collecting store feedback on which future items they would like to see offered at Cabinets to Go, and ordering accordingly. I know the new shaker products from Haiyan will be a big hit with our associates. We are also hosting a Vendor Appreciation Day before the start of our Summit.

Please see the attached letter for more detail. In order to successfully run this event, we are requesting sponsorship from our suppliers. As one of our top vendors, I would love to see Haiyan as a Platinum sponsor and in attendance.

If you can attend the Vendor Appreciation Day event, you should plan to arrive Saturday the 12<sup>th</sup>. The exhibit hall runs on Monday through 4:15pm and booths will need to be packed up after that time. Therefore, return flights could be booked Monday evening or Tuesday.

**Please confirm your attendance and sponsorship level at your earliest convenience.** The event will take place at The Drury Hotel Nashville/Franklin, 1874 W McEwen Dr, Franklin, 37067, TN. Nate Poe will follow up with room block information and more information about the Vendor events.

Sincerely,

Jason Delves  
President  
  
[2350 W O Smith Street, Lawrenceburg, TN 38464](#)  
Cell: 478-731-6036 | Office: 931-300-2985



To Our Valued Vendors,

I want to take a moment to first thank each of you for the products and services you provide to our company. We are on pace for a record 2019 and continuing to see growth opportunities in our business that make 2020 and beyond exciting times to be part of the Cabinets To Go team. As part of our growth strategy, we are investing in our business and our people by launching the Cabinets To Go Leadership Summit. This event will be a training and strategic planning meeting at which we will have an opportunity to get all our store managers, regional managers and executives in one place for the first time ever. The event will be held January 12<sup>th</sup> through January 14<sup>th</sup>, 2020 in Franklin, Tennessee which is just 15 minutes south of Nashville.

This will be an exciting opportunity for our vendors to participate in our growth and empower our leaders to advocate and understand what each partner brings to our business. We want to provide you the opportunity to highlight your products and services that we currently utilize as well as bring any new and exciting offerings you want our team to see. In conjunction with this event, we are also hosting our first Vendor Appreciation Day on Sunday January 12<sup>th</sup>. The day will include a morning meeting session with the CTG executive team, a fun activity in the afternoon and our opening night reception that evening.

We ask that you please consider one of the four Sponsorship Tiers listed below:

- ❖ **Platinum** (4 sponsorship slots available) \$15,000 –
  - Booth at Vendor Showcase – to be held Monday night January 13<sup>th</sup>
  - Logo banners in class sessions and event spaces
  - Named vendor sponsor for 1 of 4 of the marquis events
    - Opening Night Reception
    - Awards Ceremony
    - Vendor Showcase Cocktail Hour
    - Closing Night Reception
- ❖ **Gold** (4 sponsorship slots available) \$7,500
  - Booth at Vendor Showcase
  - Named vendor sponsor for a meal (breakfast/lunch)
  - Listed vendor sponsor for the Event
- ❖ **Silver** - \$5,000
  - Booth at Vendor Showcase
  - Listed vendor sponsor for the Event
- ❖ **Bronze** - \$2,500
  - Listed vendor for event

I am excited about the opportunity that this event represents for both the employees of Cabinets to Go and our vendors. Your CTG representative will be contacting you directly in the next week to answer any questions you may have.

Thank you for your support,

Jason Delves  
President - Cabinets To Go